

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

ASSOCIATION OF NEW JERSEY  
RIFLE & PISTOL CLUBS, INC.,  
BLAKE ELLMAN, and MARC  
WEINBERG

Plaintiffs,

v.

MATTHEW J. PLATKIN, in his official  
capacity as Acting Attorney General of  
New Jersey, PATRICK J. CALLAHAN,  
in his official capacity as Superintendent  
of the New Jersey State Police, RYAN  
MCNAMEE, in his official capacity as  
Chief of Police of the Chester Police  
Department, and JOSEPH MADDEN, in  
his official capacity as the Chief of Police  
of the Park Ridge Police Department,

Defendants.

Civil Action No. 3:18-cv-10507-PGS-  
JBD

MARK CHEESEMAN, TIMOTHY  
CONNOLLY, and FIREARMS POLICY  
COALITION, INC.,

Plaintiffs,

v.

MATTHEW J. PLATKIN, in his official  
capacity as Acting Attorney General of  
New Jersey, PATRICK J. CALLAHAN,  
in his official capacity as Superintendent  
of the New Jersey State Police,  
CHRISTINE, A. HOFFMAN, in her  
official capacity as Acting Gloucester

Civil Action No. 1:22-cv-04360-PGS-  
JBD

County Prosecutor, and BRADLEY D. BILLHIMER, in his official capacity as Ocean County Prosecutor,

Defendants.

BLAKE ELLMAN, THOMAS R. ROGERS, and ASSOCIATION OF NEW JERSEY RIFLE & PISTOL CLUBS, INC.,

Plaintiffs,

v.

MATTHEW J. PLATKIN, in his official capacity as Acting Attorney General of New Jersey, PATRICK J. CALLAHAN, in his official capacity as Superintendent of the New Jersey State Police, LT. RYAN MCNAMEE, in his official capacity as Officer in Charge of the Chester Police Department, and KENNETH BROWN, JR., in his official capacity as Chief of the Wall Township Police Department.

Defendants.

Civil Action No. 3:22-cv-04397-PGS-JBD

**DECLARATION OF BRADLEY P. LEHMAN IN SUPPORT OF THE  
ADMISSION PRO HAC VICE OF RAYMOND M. DiGUISEPPE**

I, Bradley Lehman, hereby certify as follows:

I am an Attorney at Law licensed to practice in the State of New Jersey, a member in good standing of the Bar of this Court, and counsel of record for Plaintiffs

in this matter. I make this Declaration in support of the pro hac vice admission of Raymond M. DiGuiseppe to act as co-counsel for Plaintiffs in this matter.

I have been advised that Raymond M. DiGuiseppe is a member in good standing and admitted to practice before several state and federal courts, as certified by him in the Certified Statement attached as Exhibit A.

I will act as local counsel for this pro hac vice counsel and will undertake all responsibilities as such.

I hereby move for pro hac vice admission of the foregoing individual. We have obtained consent to these applications from counsel for Defendants.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: May 31, 2023

Respectfully submitted,

/s/ Bradley P. Lehman

Bradley P. Lehman

# **EXHIBIT A**

**CERTIFIED STATEMENT OF RAYMOND M. DiGUISEPPE**

I, Raymond M. DiGuiseppe, hereby certify as follows:

I am a member in good standing of the bars of the following state and federal courts, and the address of each office maintaining the roll of its members is as follows:

**California State Bar (12/3/2003-present)**

180 Howard Street  
San Francisco, CA 94105

**District of Columbia Bar (8/8/2005-present)**

901 4th Street, NW  
Washington, D.C. 20001

**North Carolina State Bar (9/10/2010-present)**

217 East Edenton Street  
Raleigh, NC 27601

**New York State Bar (8/16/2018-present)**

Attorney Registration Unit  
25 Beaver Street - Room 840  
New York, NY 10004

**United States Supreme Court (1/7/2008-present)**

1 First Street, NE  
Washington, DC 20543

**Ninth Circuit Court of Appeals (7/8/2009-present)**

Office of the Clerk  
P.O. Box 193939  
San Francisco, CA 94119-3939

**First Circuit Court of Appeals (6/10/2022-present)**

1 Courthouse Way, Suite 2500

Boston, MA 02210

**U.S. District Court, Central District of CA (11/29/2007-present)**

350 W 1st Street, Suite 4311  
Los Angeles, CA 90012-4565

**U.S. District Court, Eastern District of N.C. (7/2/2012-present)**

310 New Bern Avenue  
Raleigh, NC 27601

**U.S. District Court, Eastern District of CA (5/16/2017-present)**

501 I Street, Room 4-200  
Sacramento, CA 95814

**U.S. District Court, District of Colorado (3/16/2020-present)**

901 19th Street  
Denver, CO 80294

**U.S. District Court, Northern District of CA (4/9/2020-present)**

450 Golden Gate Avenue  
San Francisco, CA 94102

**U.S. District Court, Southern District of CA (11/9/2020-present)**

333 West Broadway, Suite 420  
San Diego, CA 92101

**U.S. District Court, Western District of N.C. (1/24/23-present)**

401 West Trade Street, Room 1200  
Charlotte, NC 28202

Dated: May 31, 2023

/s/ Raymond M. DiGuiseppe

Raymond M. DiGuiseppe  
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